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9 *Attorneys for Plaintiff*
10 *Miriam Goldberg*

11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13

14 Miriam Goldberg,)	Case No.: 3:24-cv-4525
)	
15 Plaintiff,)	SECOND JOINT STIPULATION AND
)	[PROPOSED] ORDER TO ENLARGE
16 v.)	DEADLINE TO COMPLETE
)	MEDIATION
17 TeachBK, Inc., <i>et al.</i> ,)	
)	
18 Defendants.)	
)	
19)	
20)	

21 Plaintiff Miriam Goldberg and Defendants Ilya Kiselev, and Andrey Burtsev
22 (collectively, "Defendants") hereby agree and stipulate as follows:

23 The Court referred this case to mediation on February 28, 2025. [ECF No. 47]. Pursuant
24 to the ADR Local Rule 6.4(c), mediation was to be completed by May 29, 2025. Prior to that
25 deadline, on April 24, 2025, counsel for Defendants moved to withdraw from this case. [ECF
26 No. 50]. Because of that fact, the parties stipulated to enlarge the deadline to complete
27 mediation through July 31, 2025, which the Court adopted. [ECF Nos. 52 & 53]. Defendants
28

are now proceeding pro se, [see ECF No. 54], and have recently met and conferred on discovery matters as required by the Court [ECF No. 56]. To ensure that the parties can meaningfully resolve disputed discovery matters and further develop the issues and facts prior to conducting mediation, the parties have agreed to enlarge the deadline by an additional 90 days, through October 29, 2025, to complete mediation.

Accordingly, the parties stipulate and jointly request that the Court enlarge the deadline to complete mediation through October 29, 2025.

IT IS SO STIPULATED.

Dated: July 11, 2025

Respectfully submitted,

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

Attorney for Plaintiff Miriam Goldberg

/s/ Andrey Burtsev (w/ express permission)

Andrey Burtsev, Defendant

/s/ Ilya Kiselev (w/ express permission)

Ilya Kiselev, Defendant

ATTESTATION OF CONCURRENCE

I, James M. Slater, am the ECF User whose ID and password are being used to file this **JOINT STIPULATION**. I attest that, pursuant to United States District Court, Northern District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been obtained from Defendants. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2025

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that mediation must be completed no later than October 29, 2025.

Dated: _____

HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE